# ACCEPTABLE RECORDS DOCUMENTATION POLICY-DRAFT

Rule 1200 1 150400-18-01-.04(5) states "Release detection record keeping. All UST system owners and/or operators shall maintain records in accordance with paragraph 2 of R<sub>F</sub>ule 1200 1 150400-18-01-.03(2) demonstrating compliance with all applicable requirements of this rule. Release detection information shall be recorded in a format established by the division and in accordance with instructions provided by the division..."

Records that are incomplete, illegible, misleading, contain conflicting information, missing information, obvious errors, data anomalies, etc. may not be deemed acceptable to the division. Even though the detail listed below may be included, the division may still determine that a record is unacceptable if it contains problems. In accordance with rule 1200 1 150400-18-01-.04, twelve months of release detection records shall be maintained by the owner/operator. The following guidance describes what must be included as a minimum in order for each record to be considered acceptable to the Division.

#### TANK RELEASE DETECTION:

ATG: Results shall consist of a "valid" 0.2 gallon per hour leak test per tank (i.e. "pass" or "fail" and should they have a fail, they must have documentation of reporting a suspected release and doing a tank system test.) or a leak history showing the last twelve months of "valid" 0.2 gallon per hour leak tests. These tests should include test date, test time, facility test location, tank number, volume of product in the tank when test was conducted (only on static tests), test type, leak rate, and result. Some older models may not be capable of printing certain information but the facility location and ID# should be recorded by hand. Models capable of reporting probe serial number and threshold should also report these items.

SIR: The report shall include the facility information, owner information, name of SIR method and version used, name, address, and phone number of SIR provider, month being analyzed, date of report generation, tank number, tank capacity and contents, the minimum detectable leak rate and calculated leak rate for the data set (for quantitative methods), the number of days analyzed, a result that is either "Pass" "Fail", or "Inconclusive". They must also provide the raw data (inventory control) collected including daily stick readings (measured to one-eighth inch and converted to gallons), gallons sold, deliveries, water readings, meter calibration records. Failure to submit raw data for SIR analysis on a monthly basis is not monthly release detection and will not be acceptable to the Division.

CITLDS: The report shall include facility information, CITLDS Vendor and CITLDS Method.

Include in the summary report the monthly product throughput, the monthly product result, pass/fail, leak rate, MDL, tank capacity limitations, manufacturer name and model# of ATG.

IM: 12 months of Records for interstitial monitoring must be complete and must be provided using the Division's Monthly Electronic interstitial Monitoring Report Fforms CN-1340 for monthly monitoring results, and the Division's Annual Electronic Interstitial Monitoring Report Form CN-1339 (monthly and annual) for interstitial monitoring and must be complete. for the annual test of the interstitial monitoring device(s).

TTT: Must include at a minimum: test method, location of test (facility ID#, facility name and address), person conducting the test (including their employer and their certification number, if any), date of the test, test time (start and end times), tank being tested, tank product, product level, leak rate, test results as "Pass" or "Fail". All record summary sheets must be supported by field test data sheets which must be included as part of the test records.

MTG: 12 months of Records must be provided using the Division Manual Tank Gauging and Monthly Report Fform CN-1367 for manual tank gauging and must be complete. A tank chart shall be provided to indicate tank size.

Records of repairs to release detection equipment (for one year after repair for all fixed repaired equipment)

# **PIPING RELEASE DETECTION:**

SIR: 12 months of The result for SIR applies to piping as well. There will be no separate result for piping systems. records showing "Pass" or "Fail" or "Inconclusive" results (if a "Fail" or two consecutive "Inconclusive" results, they must provide documentation of reporting a suspected release and a tank system test). They must also provide the raw data collected and have documentation of the version of SIR used. See SIR section above for Tank Release Detection regarding raw data requirements.

LTT: Annual testing results must be provided using the <u>Division's Precision Line Tightness and Leak Detector Test Form CN 1341 Division form and must be complete</u>.

IM: 12 months of Rrecords must be provided using the Division forms (monthly and annual as referenced in Tank Release Detection above) for interstitial monitoring and must be complete.

ELLD: - Monthly monitoring (0.2 gph): must provide the last twelve months of leak tests and must include at a minimum date of the test, test time (start and end times), line being tested, type of leak detector, leak rates, results listed as "Pass" or "Fail".

- Annual test (0.1 gph): must be provided using the Division form referenced below and must be complete. include at a minimum date of the test, test time (start and end times), line being tested, type of leak detector, leak rates, results listed as "Pass" or "Fail".

Records of repairs to release detection equipment (for one year after repair for all fixed-repaired equipment)

## **LINE LEAK DETECTORS:**

MLLD: The applicable sections of the Division's Precision Line Tightness and Leak Detector Test Form CN 1341 shall be completed annually.

ELLD: The applicable sections of the Division's Precision Line Tightness and Leak Detector Test Form CN 1341 shall be completed annually.

Records of repairs to release detection equipment (for one year after repair for all fixed-repaired equipment)

## **CORROSION PROTECTION:**

Cathodic Protection results must be on the Division's forms as referenced below and must be complete.

## IMPRESSED CURRENT:

Also include the most current 3 year cathodic protection test results and the previous 3 year cathodic protection results on the Division's Impressed Current Cathodic Protection Testing Survey Form CN-1309 form and must be complete; and

\_Rectifier Log (60 day) on the Division's Impressed Current Cathodic Protection Rectifier Reading Form CN-1282.

# GALVANIC (per tank, line or other component):

Also include the most current 3 year cathodic protection test results and the previous 3 year cathodic protection results on the Division's <u>Galvanic Cathodic Protection Testing Survey Form CN-1140 form</u> and must be complete.

<u>Tightness test results conducted no later than 6 months but no sooner than 3 months following the addition of anodes to any cathodic protection system;</u>

INTERIOR LINING (if CP is not present or <u>not active operational</u>, the following records must be maintained, <u>however in accordance with Rule 0400-18-01-.02(4)(a)3.(v) CP must be added by December 22, 2012 or the tank must be permanently closed):</u>

#### Lining installation records

The ten year internal lining inspection and subsequent five year inspection results Lining manufacturers warranty

Tightness test results for before and after internal lining

## **INTERIOR LINING with CP**

CP installation date/records

Lining installation date/records

See CP record requirements above

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# OVERFILL (ball float valve only- flapper valves and audible/visual alarms are verified during onsite inspection):

Invoice verifying installation (if installed within the last 3 three years); or Visual verification documented by third party certification; or Field verified by inspector during inspections

## **INSTALLATION:**

For a safe suction system, installation records indicating only one check valve is present in the piping immediately below the dispenser or a signed statement from a contractor verifying the same and describing how the determination was made.

For tank systems installed on or after July 24, 2007:

• <u>R-results</u> of air pressure test or vacuum test prior to placing product into the tank, tank compartment and/or UST system

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• Tank bill of lading

- Installation checklist
- Installer's invoice

Startup (prior to dispensing fuel) system tightness test

For tank systems installed on or after July 24, 2007:

- Tank bill of lading
- Installation checklist
- Installer's invoice

## **REPAIRS** (if applicable):

Records of repairs to release detection equipment (for one year after repair for all fixed equipment)

Records of repairs to <u>steel tanks or fiberglass-reinforced plastic (FRP)</u> tanks or <u>FRP piping which have had a release of petroleum, metal pipe sections and fittings.</u>

Tightness test results conducted no later than 6 months but no sooner than 3 months following the addition of anodes to any cathodic protection system;

# **SPILL BUCKET LOGS:**

Twelve months of records shall be submitted using the Division's Monthly Spill Bucket Inspection Log Formlog CN-1286.-provided.

# **DISPENSER LOGS:**

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Four quarters of records shall be submitted using the Division's Quarterly Dispenser Inspection  $\underline{\text{Log-Form log CN-}1287-\text{provided}}$ .

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